

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF WASHINGTON

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Nov 16, 2022

SEAN F. MCAVOY, CLERK

UNITED STATES OF AMERICA v. JAMES WESLEY BOND <i>Defendant(s)</i>)) Case No. 4:22-MJ-07192-ACE))))
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CRIMINAL COMPLAINT

I, David Huntoon, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 6, 2022, in the county of Walla Walla in the Eastern District of Washington, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 641	Theft of Public Money

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent David Huntoon.

✓ Continued on the attached sheet.

David H. Huntoon
1505705

Digitally signed by David H.
Huntoon 1505705
Date: 2022.11.16 15:15:23 -08'00'

Complainant's signature

David Huntoon, Special Agent, VA OIG
Printed name and title

✓ Sworn to telephonically and signed electronically.

Sworn to before me and signed in my presence.

Date: November 16, 2022

Alexander C. Ekstrom
Judge's signature



Alexander C. Ekstrom, U.S. Magistrate Judge
Printed name and title

City and state: Yakima, Washington

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA)
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v.) Case No. 4:22-MJ-07192-ACE
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)
JAMES WESLEY BOND)

CRIMINAL COMPLAINT AFFIDAVIT

1. I am a Special Agent with the Department of Veterans Affairs (VA) Office of Inspector General (OIG) and have been so employed since April 2017. I was previously a Special Agent with the United States Secret Service (USSS) from January 2010 to April 2017. My current assignment is to the Northwest Field Office in the Spokane, Washington Resident Agency. I earned a Bachelor of Arts in Political Science from the University of Washington. Prior to becoming a federal agent, I served four years in the Army as an Infantry Platoon Leader achieving the rank of Captain.

2. In January 2010, I attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center (FLETC). This training covered the investigation of violations of federal laws, the process of criminal investigations, and the judicial process. Following FLETC, I attended the Secret Service training academy in Beltsville, MD. This training focused specifically on the violation of

federal laws, which the Secret Service investigates; to include bank fraud, wire fraud, counterfeit currency, and cyber-crimes.

3. The Inspector General Act of 1978 (Public Law No. 95-452), enacted in October 1978, statutorily established the Office of Inspector General (OIG) for the Department of Veterans Affairs. The purpose of the OIG is to conduct audits, investigations, and inspections of VA programs, operations, and other activities carried out or financed by the VA; to recommend policies that promote economy, efficiency, and effectiveness; and to prevent and detect criminal activity, waste, abuse, and mismanagement in the VA.

4. As part of my duties, I investigate violations of federal law relating to programs and operations of VA. This includes violations of Title 18, United States Code, Section 641, Theft of Public Money, and other statutes prohibiting fraud that impact VA. I have gained experience in the conduct of such investigations through training in seminars, classes, and work related to conducting these types of investigations. Through these investigations, I have led or actively participated in cases involving contract fraud, procurement fraud, theft of government funds, embezzlement, bribery, identity theft, impersonation of government employees, and other forms of fraud. I am currently a sworn federal law enforcement officer.

STATEMENT OF FACTS IN SUPPORT OF PROBABLE CAUSE

5. This complaint concerns an allegation of fraud, through personal use of a VA fleet card assigned to a vehicle at the Walla Walla VA Medical Center (VAMC). After VA employees conducted a review of fleet cards, one card was found to have charges with no receipts assigned to a vehicle that had only traveled approximately 18 miles. Preliminary investigation by the VAMC and Walla Walla VAPD obtained photo surveillance from gas stations where the card was used showing former Walla Walla VAMC fleet manager James BOND using the card.

BOND had previously resigned from his position in the summer of 2021. As Fleet Manager, BOND was responsible for managing the VAMC's fleet of vehicles and had access to VA-issued fleet credit cards issued for purpose of purchasing fuel for VA vehicles and for official government business, including a VA fleet card issued by U.S. Bank with an account number ending in 1781.

6. On 2/11/2022, Aaron Bailey, Chief Engineer for Facilities Management Service (FMS) for the Walla Walla VAMC, and former supervisor of BOND, emailed Officer Thomas Spicknall, VAPD regarding "FMS Fleet Card Misuse." Bailey reported alleged misuse on VA Fleet card ending in 1781. He reported the card was associated with an "inoperable vehicle" and that there were possibly 118 bad transactions dating back to February 2021. Bailey advised the card was put on hold.

7. On 2/15/2022, Cody Britton of Wild Horse Resort, provided video surveillance images from a gas pump at the Arrowhead Travel Plaza at 72485 OR-331, Pendleton, OR 97801 on 1/24/2022 at 0947 showing a James BOND making a purchase on the card ending in 1781. BOND pumped gas into a Black Chevrolet Silverado bearing OR license plate EBJL.

8. On 2/16/2022. Bailey reported to Officer Timothy Brown, Walla Walla VAPD, about the vehicle that VA Fleet card ending in 1781 was assigned to. It was a Ford F450 Econoline bearing VA license plate VA22210 assigned to the VA's Residential Rehabilitation Unit (RRU). He reviewed bank statements associated with the card and reported that the vehicle should not have been used much as the RRU was closed multiple times in 2020 and 2021. Officer Brown learned from Bailey that the VA Fleet card ending in 1781 was issued by US Bank, and US Bank statements were to be checked against receipts every month, approved, and the invoices scanned back to the back as part of the approval process. The statements with questioned charges were the responsibility of the Fleet Services

Manager, a position held by James BOND until his resignation in June 2021.

9. On 2/22/2022, Officer Brown obtained additional video surveillance images of BOND using the card ending in 1781 on 12/28/2021, 1/24/2022, and 1/31/2022 at the Arrowhead Travel Plaza.

10. On 3/2/2022, the Spokane Resident Agency was contacted by the Walla Walla Veterans Affairs Police Department to report the fraud.

11. On 3/3/2022, SA Huntoon obtained BOND's eOPF file from his employment with VA. BOND was hired at the Walla Walla VAMC as a mail clerk beginning in 6/26/2016. On 9/2/2018, he promoted to Motor Vehicle Operator. On 7/2/2021 he resigned from his position as Motor Vehicle Operator and left employment with the VA. As part of his resignation, he submitted an email to Aaron Bailey on 6/23/2021 indicating his intent to resign as Fleet Manager because it was "time to move on." A hand-written addendum to the email indicated that 6/25/21 would be his last day of employment.

12. On 3/8/2022, SA Huntoon and RAC Jackson observed a 2005 Black Chevrolet Silverado bearing OR license plate EB JL parked in a handicapped spot in front of building 145. A driver was observed shortly thereafter leaving the vehicle and walking in to building 74. SA Huntoon photographed the vehicle bearing Oregon License plate EB JL registered to James Wesley BOND at 337 S Andrea St. Milton Freewater, OR 97862.

13. Continuing on 3/8/2022, SA Huntoon and RAC Jackson interviewed BOND's supervisor, Aaron Bailey at the VA Police Department at the Walla Walla VAMC. Bailey described his and BOND's positions at the Walla Walla VAMC, Fleet management, the Fleet card reconciliation process, and the discovery of misuse for the Fleet card ending in 1781 associated with VA vehicle VA22210. Bailey reviewed the photos showing transactions on the card ending in 1781 for \$60.02 on 1/24/2022 and confirmed BOND was in the photos. Bailey confirmed BOND

should not have the VA fleet US Bank card ending in 1781 in his possession following his resignation from his position with VA. He could not recall any reason or statement made by anyone that would have given BOND permission to use the card for personal use.

14. On 3/9/2022, SA Huntoon and RAC Jackson interviewed BOND in front of building 74 at the Walla Walla VAMC. SA Huntoon and RAC Jackson identified themselves by way of their service-issued credentials and requested an interview concerning an allegation with BOND's past position. BOND reported that was not a good day and asked how long it might take. SA Huntoon advised approximately 30 minutes. BOND advised he was with a veteran currently and had appointments later. SA Huntoon advised he did not mind interrupting the appointment if the matter could get cleared up. SA Huntoon advised BOND he did not have to talk to him. BOND suggested they talk outside in front of the building. SA Huntoon then met BOND in front of building 74 and sat at a table near the entrance for interview. BOND was advised he was free to leave. After he was confronted with photograph evidence of him using VA fleet card ending in 1781 at the Arrowhead Travel Plaza BOND admitted to using the VA fleet card ending in 1781 for personal use following his resignation as the Fleet Manager at the Walla Walla VAMC. BOND admitted, "you got me dead to rights" and he did have the card. He stated, "I fucked up," and described he was going through extreme financial hardships and offered to pay back the monies. BOND confirmed he only used the card to make gas purchases that he used for his personally owned Black Chevrolet Silverado bearing Oregon license plate EBJL which he pointed to during the conversation. BOND denied sharing the card with anyone else for use and stated he was solely responsible. BOND confirmed that all charges on the card ending in 1781 after he left the VA were for personal use. BOND reported he destroyed the VA fleet card ending in 1781 shortly after it was declined.

BOND expressed contrition stating, “All I can say is I’m sorry and I would do anything to make this right.”

15. On 3/10/2022, Bailey provided SA Huntoon all US Bank statements for the VA fleet card ending in 1781 showing transactions from June 2021 to when the card was shut down in February 2022 as well as a spreadsheet he had compiled that included the mileage amounts entered at the pump for each transaction. Based on Bailey’s spreadsheet, and SA Huntoon’s review of the bank statements, a total of \$4,122.48 was charged on the VA fleet card ending in 1781 after BOND’s last day of work on 6/25/21. This included charges at the Arrowhead Travel Plaza on 12/28/2021, 1/24/2022, and 1/31/2022 totaling \$134.02, as well as additional fraudulent charges conducted by Defendant in the Eastern District of Washington. Each fraudulent charge was drawn on, and resulted in theft from, the Walla Walla VAMC's U.S. Bank account located in the Eastern District of Washington.

CONCLUSION

Based on the foregoing, there is probable cause to believe the BOND engaged in a violation of criminal law, specifically one count of 18 U.S.C. § 641 (Theft of Public Money).

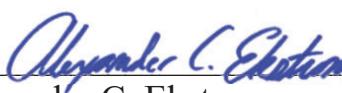
Respectfully submitted,

David H. Huntoon
1505705

David Huntoon
Special Agent
Veteran's Affairs
Office of Inspector General

Subscribed electronically and sworn telephonically this 16th, day of November, 2022.

Nov 16, 2022, 3:21 pm


Alexander C. Ekstrom
United States Magistrate Judge

